REMARKS

This application has been carefully reviewed in light of the Office Action mailed July 16, 2004. Claims 1-46 are pending in the Application. Applicant has amended Claims 1, 24, 36, and 37. Reconsideration and favorable action is requested.

Section 112 Rejections

The Examiner rejects Claim 36 under 35 U.S.C. § 112, second paragraph, as being indefinite for the stated reason that the claim term "package" is a "relative term which renders the claim indefinite," and that ". . . one or ordinary skill in the art would not be reasonably apprised of the scope of the invention." To advance the prosecution of this case, Applicant amends Claim 36 to read "software operable to render drawings." Applicant respectfully submits that the amended Claim 36 includes no indefinite claim terms, and requests the Examiner to withdraw this rejection. Favorable action is requested.

Rejections Under 35 U.S.C. § 103

The Office Action rejects Claims 1-46 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,978,847 to Kisor et al. ("*Kisor*") in view of U.S. Patent No. 5,987,841 to Berger ("*Berger*"). Applicant respectfully traverses these rejections for the reasons described below.

Claim 1 is allowable because *Kisor* does not teach or suggest "in response to requesting downloading of the selected file [which includes instructions to access, either directly or indirectly the associated file], initiating downloading of the selected file and **automatically determining the identity of, and initiating downloading of, the at least one associated file . . . ,**" [emphasis added] as recited by Claim 1. The Office Action asserts that the Abstract, FIGURE 10, and the portion of the specification in column 6, line 39-column 7, line 38 of *Kisor* disclose this limitation, but this assertion is incorrect. The identified portions in fact describe an attribute page 420 that includes keywords in a Web page 410, and using the attribute page 420 to determine **whether** to download the Web page 410. (*See* the first sentence of the Abstract - "The present invention relates to an electronic system and its corresponding method of determining the attributes of a Web page without downloading the Web page," and column 6, lines 45-51 - "In the preferred embodiment, the attribute page 420 includes an attribute list 422 (i.e., significant keywords of the Web page) and a frequency list 424 which specifies the frequency of occurrence of each keyword contained within the Web

page 410.") However, neither the identified portions nor any other portion of *Kisor* discloses **automatically** initiating the downloading of an associated file **in response to** requesting the download of a selected file. Further, nothing in *Kisor* suggests that the selected file includes instructions to access the associated file. Rather, *Kisor* describes the attribute page 420 as a file that merely describes certain attributes of the Web page 410, and does not teach or suggest that either the Web page 410 or the attribute page 420 is operable to access the other. *Berger* also does not show this limitation, and the Office Action does not assert that it does. Because this limitation is not shown by the cited references, Claim 1 is allowable.

Claim 1 is allowable also because none of the cited references teaches or suggests "initiating storing, in a memory associated with the client, of the selected file and the at least one associated file under **respective local identifiers**," [emphasis added] as recited by Claim 1. The Examiner concedes that this limitation is not shown by *Kisor*, but nevertheless asserts that FIGURE 11E and column 9, line 43-column 10, line 4 of *Berger* show this limitation. This assertion is incorrect. *Berger* generally discloses a method for caching bodies of information before they are requested by a user to improve response time, and the identified portions of *Berger* in fact describe a determination of whether it would be appropriate to provide the cached information to a user in response to a request. However, nothing in *Berger* teaches or suggests storing downloaded files under respective **local identifiers**. In some embodiments of the invention, such a method of storage is advantageous because it improves efficiency of file access at a client level. *Berger* does not benefit from this advantage because the missing limitation is absent from the described invention of *Berger*. Because this limitation is missing from *Berger*, Claim 1 is allowable. Favorable action is requested.

Claims 13, 24 and 37 are allowable for reasons analogous to those provided in conjunction with Claim 1. Claim 13 is allowable also because none of the cited references teaches or suggests "requesting, by the client, downloading of a selected file residing in the server, the selected file associated with at least one associated file, **the selected file and the at least one associated file identified by respective Uniform Resource Locators**," [emphasis added] as recited by Claim 13. The Office Action appears to assert that the emphasized portion of the identified limitation of Claim 13 is shown by FIGURE 6 and column 4, lines 45-67 of *Kisor*, but this assertion is incorrect. The identified portions of *Kisor* in fact describe allowing a user to click on a URL to download a Web page, but do not describe an identification of **both** a selected file **and** a file associated with the selected file

using their respective Uniform Resource Locators. In some embodiments, such a use of a Uniform Resource Locator - which is a globally unique identifier - allows one to find and download both the selected file and the associated file that may have been relocated and/or renamed. *Kisor* does not benefit from this advantage. This missing limitation is also not shown by *Berger*, and the Office Action does not assert that it does. Thus, Claim 13 is allowable. Favorable action is requested.

As depending from allowable independent Claims 1, 13, 24, and 37, dependent Claims 2-12, 14-23, 25-36, and 37-46 are also allowable. Further, Claim 4 is allowable for reasons analogous to those provided in conjunction with Claim 13. Favorable action is requested.
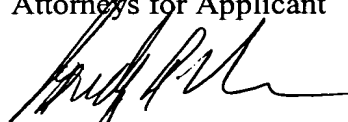
CONCLUSION

Applicant has now made an earnest attempt to place this case in condition for immediate allowance. For the foregoing reasons and for other apparent reasons, Applicant respectfully requests allowance of all pending claims.

If the Examiner feels that prosecution of the present Application may be advanced in any way by a telephone conference, the Examiner is invited to contact the undersigned attorney at 214-953-6447.

Applicant does not believe that any fees are due. However, the Commissioner is hereby authorized to charge these fees and any extra fee or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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